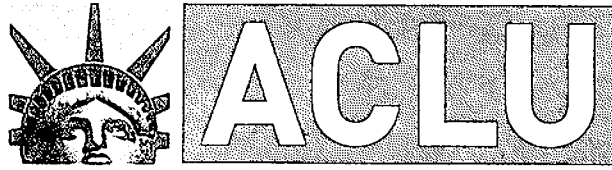


THE
ROGER
BALDWIN
FOUNDATION
OF ACLU,
INC.



**ROGER BALDWIN FOUNDATION
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December 19, 2011

VIA MESSENGER AND EMAIL

Mr. Paul Spieles
Chief Operating Officer
Chicago Public Building Commission
RICHARD J. DALEY CENTER
50 West Washington Street
Suite 200
Chicago, Illinois 60602
Email: paul.spieles@cityofchicago.org

Re: Daley Plaza closure

Dear Mr. Spieles:

The American Civil Liberties Unions of Illinois (“ACLU”) wishes to hold an Assembly and Teach-In for Free Speech during the G-8/NATO Summit (“Summit”) in Chicago May 19 – 21, 2012. Our preferred date is May 19th at 11:00 a.m. We believe that the most effective and appropriate venue for that assembly is the Richard J. Daley Plaza (“Daley Plaza”), the quintessential public forum for political expression in the City of Chicago.

We are aware that on November 9, 2011, Ms. Krepel of MB Realty Service, PBC’S agent, wrote Mr. Joe Isobaker that “no permits will be issued for use of Daley Plaza from May 15 – 22, 2012.” Ms. Krepel further wrote that Mr. Isobaker instead should consider using the Thompson Center Plaza.

We also are aware that on December 9, 2011, Marc Beem of the law firm of Miller Shakman & Beem LLP wrote to Ms. Krepel on behalf of the American Friends Service Committee requesting that AFSC be allowed a permit for the Plaza during the Summit. Further, citing the Isobaker communication, Mr. Beem asked whether the PBC and/or MB Realty Services will issue permits during the period of the Summit. In response, you wrote Mr. Beem that no application for 2012 could be submitted prior to January 1, 2012, and that if AFSC submits an application after that date “it will be processed in conformity with the PBC Board regulations.” However, you failed to respond to his questions of whether permits will be issued during this period and whether PBC has decided to close Daley Plaza to rallies and demonstrations during the Summit, as reflected in the communication of Ms. Krepel to Mr. Isobaker.

Mr. Paul Speles
Chicago Public Building Commission
Page 2

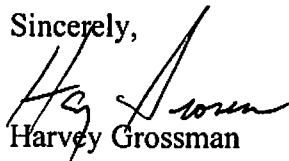
We wish to point out that while Mr. Isobaker submitted his application in June, 2011, he was not to our knowledge advised that his application was untimely and should be submitted after January, 2012. PBC's agent waited approximately 6 months, and then advised that no permits would be granted for the period in question.

The conduct of the PBC and MB Realty Service has confused and frustrated the planning for First Amendment protected expression in our City during an important period. We do not wish to apply for a permit only to be told, as Mr. Isobaker was, that no permits will be issued during the period in question.

Based on the events described above, we believe that we must move with dispatch to resolve the availability of Daley Plaza as a forum for expression during the Summit. If we do not receive a written communication to the contrary from the PBC, we will proceed on the basis that in conformity with Ms. Krepel's communication to Mr. Isobaker, the PBC has decided to close Daley Plaza to rallies and demonstrations during the Summit.

The ACLU believes that such a closure of this public forum is a violation of the First Amendment to the United States Constitution. We hope PBC will be willing to discuss this matter with us and clear up these issues expeditiously. However, if we do not hear from you by the close of business on Wednesday, December 21, 2011, that the Plaza will be open for expression and that permits will be issued for such events during the Summit, we will take appropriate legal action seeking that outcome.

Sincerely,



Harvey Grossman

cc: Marc O. Beem